

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

JAMES AND KELARA GHASAR,)
Individually and as Personal Representatives)
and Co-Administrators of the Estate of Bijan C.)
Ghasar, Deceased,)

Plaintiffs,)

v.)

UNITED STATES OF AMERICA,)
Defendant.)

Case No. 1:19-cv-1224 (CMH/IDD)

**UNITED STATES OF AMERICA’S
MOTION TO STAY**

Pursuant to this Court’s inherent authority, Defendant United States of America, through undersigned counsel, hereby moves to stay any further proceedings in this action pending a decision by the Fairfax County Commonwealth’s Attorney on whether to pursue criminal charges for the same conduct at issue in this case, and if charges are filed, pending completion of the criminal proceedings. The grounds for this motion are fully explained in the simultaneously-filed memorandum of law in support of the motion.

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